

### REMARKS

Applicants would like to express their appreciation to the Examiner for the indication of allowed and allowable subject matter in the above-identified Office Action. Applicants further express appreciation to the Examiner for participating in a telephone conference with applicant's attorney.

In the above-identified action, the Examiner has rejected Claims 12-14, 29 and 30 under 35 U.S.C. 102 (e) for being anticipated by Metcalfe et al. US 6,446,323. The examiner specifically references "profile 30" and appears to understand that such profile is read upon by the claims of the present application. Applicants have carefully reviewed the Metcalfe et al. reference and would like to point out to the Examiner that nowhere in the reference is there taught an "orientation profile", rather what is taught in the reference is a latching-type profile. This profile 30 is distinct from an orientation profile as claimed. A latching profile is one that will provide location to a tool in the downhole environment. More specifically, the profile 30 allows a collet or similar locking/latching system to engage the profile 30 and provide feedback to the well operator that the tool has reached a certain depth in the wellbore. This information can be useful to monitor progress of a tool or the profile itself can be useful to locate and maintain a tool in place. Such a profile as the one disclosed in Metcalfe et al., however, provides absolutely no indication of orientation of a tool and no assistance with respect to orientating a tool in the downhole environment. Orientation has to do with the rotational angle a tool has in the wellbore. Because a tool will simply spin within the profile 30 of Metcalfe et al, there is no feedback of any kind to the operator of orientation. For these reasons, the profile of Metcalfe et al. can not be called an "orientation" profile as is required by the present claims. An orientation profile either provides notational orientation to a device or provides an indication of a particular orientation of a device as a result of rotation of the device from another source. Neither one of these properties can be found in Metcalfe et al.

In view of the foregoing, applicants strongly believe the application is in condition for allowance which action is earnestly solicited.

Applicant respectfully requests reconsideration of the rejection and early allowance of all of the claims in the present application.

In the event the Examiner has any queries regarding the instantly submitted Amendment, Applicant's attorney respectfully requests the courtesy of a telephone conference to discuss any matters in need of attention.

In the event that there are any fees due with respect to this Response, Applicant's attorney respectfully requests that such fees be withdrawn from Deposit Account No. 02-0429 maintained by Applicants' assignee.

Respectfully Submitted,

CANTOR COLBURN LLP

By: 

Keith J. Murphy

Registration No. 33,979

55 Griffin Road South

Bloomfield, CT 06002

Telephone: (860) 286-2929

Facsimile (860) 286-0115

Customer No. 23413

Date: November 24, 2004